

David J. Bradley, Clerk

Page 1

2. The Parties have engaged in limited discovery because they are waiting for a ruling on plaintiffs' motion for conditional certification. The resolution of said motion will substantially affect the course of litigation and the parties do not want to run up legal fees and costs without knowing how many plaintiffs will be involved in this case.

3. In light of the foregoing, the Parties propose to extend all the pretrial deadlines and continue the trial as follows:

- a. Discovery deadline: 4 months after the court rules on plaintiffs' motion for conditional certification;
 - b. Motions deadline: 5 months after the court rules on plaintiffs' motion for conditional certification;
 - c. Joint Pretrial Order (Defendants' final version due to Plaintiff): 9 months after the court rules on plaintiffs' motion for conditional certification;
 - d. Joint Pretrial Order (Plaintiff filing deadline and Motions in Limine deadline): 9 months and one week after the court rules on plaintiffs' motion for conditional certification;
 - e. Docket Call: 10 months after the court rules on plaintiffs' motion for conditional certification;
 - f. Trial: 10 months and 1 week after the court rules on plaintiffs' motion for conditional certification. emails before she could take depositions.
- Therefore, as a result of the pandemic and the resulting stay-at-home orders, the parties have been unable to get to deposition in this case.

4. Accordingly, the parties are requesting a roughly additional ninety (90) days to finish discovery in this case. The parties are also requesting that the case be moved from the

5. This motion is made in good faith and is not sought for delay, but so that justice may be done.

PRAYER

For the foregoing reasons, the Plaintiffs and the Defendants respectfully move that this Court continue the various settings as discussed above; and for all other relief, at law or in equity, to which the parties may be entitled.

Respectfully submitted,

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